

# EXHIBIT O

**Judd Burstein**

---

**From:** Tyrone Blackburn <tblackburn@tablackburnlaw.com>  
**Sent:** Wednesday, January 26, 2022 10:09 PM  
**To:** Steven Gordon  
**Cc:** Judd Burstein; Emily Finestone; Peter B. Schalk; Victor Weberman  
**Subject:** Re: Sanctions motion

Judd,

I have no problem with submitting a joint letter withdrawing some the language used to describe your actions and intentions towards Mrs. Gordon, if you agree to apologize for leaking an email that referred to Plaintiff's counsels as bottom feeders.

Additionally, you also encouraged bloggers to repost emails of you praising the work they did in assisting you in this case. You essentially co-signed the harassment these bloggers visit upon Ms. Hough on a daily basis.

Regards,

Tyrone A. Blackburn, Esq.  
T. A. Blackburn Law, PLLC  
TABlackburnlaw.com

On Jan 26, 2022, at 10:00 PM, Steven Gordon <sg@nytlaw.com> wrote:

Judd,

I did not say that you had an obsession with my wife, and your email candidly did make me consider withdrawing from this case for the safety of my wife and I. Nothing I said was inaccurate. The only obsession I alluded to is the one in which you will apparently do or say anything to try to personally harm me.

We will be awaiting your motion and will respond with our proposed briefing schedule.

On Wed, Jan 26, 2022 at 9:28 PM Judd Burstein <[jburstein@burlaw.com](mailto:jburstein@burlaw.com)> wrote:

Victor from my office will be emailing you our sanctions motion tonight. Substantively, it is final, but we still need to proof it more carefully and collect the exhibits. We will finish that up by Friday, but you will not receive anything that you do not already have available to you tonight.

I am having the motion sent to you tonight because I believe that it is fair for you to have a chance to analyze it before we seek to agree on a schedule. My view on scheduling depends upon whether you are prepared (after reading my

papers) to withdraw all of the false claims which you have made about my supposed sick obsession with Steven's wife which led me to engage in creepy cyberstalking and thereby put Steven in fear for the safety of his family. If you will agree to acknowledge that these allegation are untrue in a way that publicly clears my name, I will agree to a schedule which gives you until March to answer my papers.

However, if you do not withdraw those accusations in full and in writing, I am going to push for an expedited briefing schedule in light of the fact that your vile accusations have been repeated on the internet.

Judd Burstein

Judd Burstein, P.C.

260 Madison Avenue

15<sup>th</sup> Floor

New York, New York 10016

(212) 974-2400

(212) 974-2944 (Fax)

**MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL AND/OR  
GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST AND PROOFREADER –  
PARTICULARLY WHEN I AM DRAFTING AN EMAIL UNDER TIME PRESSURE**

--  
Steven N. Gordon, Esq.  
Tsyngauz & Associates, P.C.  
114 Mulberry Street, Ground Floor  
New York, NY 10013  
Telephone: (212) 337-9770  
Facsimile: (212) 337-3375  
Email: [sg@nytlaw.com](mailto:sg@nytlaw.com)